

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X

ROSE ANN PAGUIRIGAN, individually and  
on behalf of all others similarly situated, :

Plaintiff, : 1:17 Civ. 1302 (NG) (JO)

-vs- : **NOTICE OF MOTION**

PROMPT NURSING EMPLOYMENT AGENCY :  
LLC d/b/a SENTOSA SERVICES, :  
SENTOSACARE LLC, SENTOSA NURSING :  
RECRUITMENT AGENCY, BENJAMIN LANDA, :  
BENT PHILIPSON, BERISH RUBENSTEIN a/k/a :  
BARRY RUBENSTEIN, FRANCIS LUYUN, :  
GOLDEN GATE REHABILITATION & HEALTH :  
CARE CENTER LLC, and SPRING CREEK :  
REHABILITATION AND NURSING CENTER, :

Defendants. :

-----X

PLEASE TAKE NOTICE that, upon the annexed Declaration of John Howley, the exhibits annexed thereto, the accompanying Declaration of Leandro B. Lachica, the accompanying Memorandum of Law, and all prior proceedings had herein, plaintiff Rose Ann Paguirigan will move this Court, at the United States Courthouse, 225 Cadman Plaza East, Brooklyn, New York 11201, on a date and at a time to be determined by the Court, for an Order: (a) certifying this action as a class action pursuant to Rule 23(b)(3) or, in the alternative, Rule 23(b)(2) of the Federal Rules of Civil Procedure; (b) appointing plaintiff's attorneys to represent

the class; and (c) granting such other relief as this Court deems just.

Dated: New York, New York  
December 29, 2017

THE HOWLEY LAW FIRM P.C.

By: /s/ John Howley  
John Howley  
Leandro B. Lachica  
350 Fifth Avenue, 59<sup>th</sup> Floor  
New York, New York 10118  
(212) 601-2728  
*Attorneys for Plaintiff*